

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

Adalberto ANGULO-Nunez
Defendant.

Magistrate Case No.:


'08 MJ 8070

COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)


The undersigned complainant being duly sworn states:

That on or about January 27, 2008, within the Southern District of California, defendant Adalberto ANGULO-Nunez did knowingly and intentionally import approximately 35.60 kilograms (78.32 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Rudy Garcia, Special Agent
U.S. Immigration and
Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 28th
DAY OF January 2008.


PETER C. LEWIS
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Adalberto ANGULO-Nunez

4 STATEMENT OF FACTS

5 This statement of facts is based on the reports, documents, and notes furnished
6 to US Immigration and Customs Enforcement Special Agent Rudy Garcia.

7 On January 27, 2008, at approximately 1355 hours, Adalberto ANGULO-Nunez
8 attempted to enter the United States from the Republic of Mexico at the Calexico, CA
9 East Port of Entry. ANGULO was the driver, registered owner of a 2001 Chevrolet
10 Malibu sedan with California license number 5JTU372. ANGULO was accompanied by
11 two of his children and a niece.

12 During a pre-primary roving operation, Canine Enforcement Officer (CEO) Jones
13 used his narcotic detection dog (NDD) to screen the vehicle. The canine alerted to the
14 front fender area of the vehicle. CEO Jones informed Officer Payne of the alert.

15 ANGULO presented his U.S. resident alien card bearing his name to Officer
16 Payne and gave a negative Customs declaration. Officer Payne inspected the vehicle
17 engine compartment, noted that there was a strong odor of silicone, observed a non-
18 factory compartment in front of the fenders, and discovered packages concealed within
19 the compartment. Officer Payne escorted ANGULO, the children, and the vehicle to the
20 vehicle secondary lot for further inspection.

21 A subsequent inspection of the vehicle revealed 30 packages concealed inside
22 the front fender wells of the vehicle. One of the packages was probed and it field-
23 tested positive for cocaine. The 30 packages had a combined net weight of
24 approximately 35.60 kilograms (78.32) of cocaine.